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Attorneys for the Defendant

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	
)	
ALLEN WILLIAM OCKEY,)	
)	
Defendant)	
_____)	Case No. 3:22-cr-0030-SLG-MMS

SENTENCING MEMORANDUM

COMES NOW, Defendant, Allen W. Ockey by and through Counsel, Darryl L. Thompson of the Thompson Law Group P.C. and respectfully submits the following sentencing memorandum.

First, Mr. Ockey has no objections to the guideline calculations as performed by the presentence author and has no objection to presentence report. He acknowledges that he has one prior criminal history point, a driving under the influence. He agrees with analysis of 18 U.S.C. § 3553(a) factors as set for by the probation officer who drafted the presentence report, and elects to not repeat that analysis in details in this memorandum.

Mr. Okey found himself caught up in his core hobby and it definitely took him astray when he became involved in importing some from the Philippines. Once the charges were lodged, he very quickly obtained counsel, engaged in meaningful dialogue with the U.S. Attorney's office to reach an early agreement. He maintains that he has satisfied the criteria set out in U.S.S.G. § 3E1.1 and the applicable application notes and maintains he should be afforded a two-level downward adjustment for acceptance of responsibility and, that U.S.S.G. § 3E1.1(b) applies, and thus there should be a to move for the additional one level adjustment for acceptance of responsibility.

As a result of that pleas agreement, on July 29, 2022 he plead guilty to Wildlife Trafficking Conspiracy, a violation of 18 U.S.C. § 371.

He is a 35-year-old man, with a young family, gainfully employed, and this event has been extremely impactful upon him. He appreciates the gravity of the circumstances, certainly he did not appreciate it at the time, but now clearly does. Consistent with the arguments as presented by the pre-sentence author, based on the factors as cited in the presentence report and analysis in said report, the undersigned agrees with probation officer's recommendation for a two year term of probation, and a \$4,000 fine.¹ The agrees that this recommended sentence is sufficient, but not greater than

¹ That said, he did agree to and is prepared to pay over the \$5,000.00 as a donation as reference dint he plea agreement.

necessary, to reinforce the 3553(a) factors of nature and circumstances of the offense and seriousness of the offense.

DATED at Anchorage, Alaska, this 21st day of October, 2022

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Certificate of Service

I certify that on October 21, 2022
a copy of this foregoing document
was served electronically on

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/s/ Pennelopy Lawson
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